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May 11, 2023

**VIA ECF**

Hon. John P. Cronan  
United States District Court  
Daniel P. Moynihan U.S. Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: United States v. James Dermot McGonnell  
Docket No. 06 Cr. 1197 (JPC)**

Dear Judge Cronan:

I represent Defendant in the above matter and write to request a 30-day extension of Defendant's time to oppose the government's pending motion for a Preliminary Order of Forfeiture as to Substitute Assets. Dkt. 51. Defendant's opposition is presently due on May 12, 2023. Dkt. 54. The reason for this request is that the parties are endeavoring to resolve the issues raised by the motion, an effort that includes the sale of one of the two properties specified therein (the other property is my client's family home) and the deposit of Defendant's share of the net proceeds in escrow, as detailed in the Stipulation recently so-ordered by the Court. Dkt. 56. The government consents to this request.

I thank the Court for its attention to this matter.


Respectfully,

*Niall MacGiollabhui*  
Niall MacGiollabhui

cc: AUSA Tara LaMorte

The request is granted. Mr. McGonnell shall oppose the motion by June 12, 2023.

SO ORDERED  
Date: May 12, 2023  
New York, New York

  
JOHN P. CRONAN  
United States District Judge